

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

Mark L Pereguoy

Plaintiff.

\*

v.

\*

State of Maryland, Carroll County,  
Maryland and Kenneth L.  
Tregoning, Carroll County Sheriff

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CIVIL ACTION NO.  
MJG02CV4165

Defendants.

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**AFFIDAVIT OF MAJOR E. STEPHEN TURVIN**

1 I am over the age of 18 years

2 I am competent to testify; I am a Deputy Sheriff employed by the Sheriff of  
Carroll County, Maryland. am currently the Assistant Warden of the Carroll County  
Detention Center.

3. As part of my duties as Assistant Warden, I act as the Shift Commander. This means  
I manage the security operations of the detention center. I am also responsible for monitoring  
the safety and well being of staff, volunteers, visitors, and inmates. My primary  
responsibility as Shift Commander is to monitor and ensure that subordinate supervisors  
implement and fully execute the established policies and procedures, special orders, and  
directives. In the absence of the Warden and the Assistant Warden, the Shift Commander is  
authorized to act as the Warden's designee.

4. In January, 2002, I attended a meeting with Colonel Robert Keefer, Warden George  
Hardinger, and Captain Mark Perego. During this meeting, the Warden gave out job  
descriptions to both me and Mr. Perego. The job descriptions generally outlined our new

assignments and duties. According to the Warden, I would be the Shift Commander for the day shift and Captain Peregoy would be the Shift Commander for the evening shift. Also during this meeting, the Warden stated that Captain Peregoy and I would perform similar duties but on different shifts.

5 Following this meeting, I met privately with the Warden, at my request and on my own initiative, to inquire more specifically as to the nature of my new assignment.

6 At no time during this meeting did Captain Peregoy state or express any concern that, as a result of this reassignment, he would left with no duties or responsibilities as an employee of the Carroll County Sheriff's Office.

**I HEREBY DECLARE OR AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE CONTENTS OF THE FOREGOING AFFIDAVIT ARE TRUE AND CORRECT BASED UPON MY PERSONAL KNOWLEDGE.**

Earl Stephen Turvin

EARL STEPHEN TURVIN  
ASSISTANT WARDEN, CARROLL  
COUNTY DETENTION CENTER